

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KIA JOHNSON-THOMAS,
Plaintiff

v.

PHILADELPHIA FEDERATION OF
TEACHERS, THE SCHOOL DISTRICT
OF PHILADELPHIA, THE SCHOOL
REFORM COMMISSION and LEROY
D. NUNERY, II

Civil Action

2:12-cv-02869(ABB)

STIPULATION FOR FOURTH EXTENSION OF TIME
TO FILE RESPONSES TO COMPLAINT PENDING
FINALIZATION OF TENTATIVE SETTLEMENT AGREEMENT

This action originally was filed in the Court of Common Pleas for Philadelphia County, and removed on May 24, 2012, to this Court by Defendants. The Defendants' responses to the Complaint are due on or before September 17, 2012, following Court approval for a third extension request.

The Parties hereto have reached a tentative settlement agreement. However for the reasons set forth in the written letter submitted to the Court with this stipulation, the settlement cannot be finalized until certain events, not within the Parties' control, occur. For these reasons, the Parties, by and through their respective counsel, hereby move the Court to hold this matter in abeyance until Wednesday, October 31, 2012. Should this matter not settle by October 31, 2012, defendants shall answer or otherwise respond to the Complaint on or before October 31, 2012.

For good cause shown by Plaintiff's counsel in his written letter submission to the Court in support of this stipulation, the Court hereby APPROVES this stipulation and this matter shall be held in abeyance until October 31, 2012 by which date, if settlermer

is not finalized, defendants shall answer or otherwise plead in response to the Complaint on or before October 31, 2012.

Respectfully submitted jointly by:

/s/ FRANK FINCH, III

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/s/ LINDA M. MARTIN

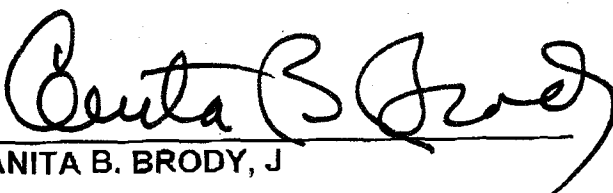
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APPROVED BY THE COURT:

Date: Sept 13 2012


ANITA B. BRODY, J